

Fill in this information to identify the case:

Debtor 1 Woodrow Paul Schmidt

Debtor 2 Cynthia Ann Schmidt
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 17-01806 HWV**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: MidFirst Bank

Court claim no. (if known): 5-2

Last 4 digits of any number you use to identify the debtor's account: 1443

Property address:

691 Silver Maple Circle
Seven Valleys, PA 17360**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>20,217.25</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>40.00</u>
c. Total. Add lines a and b.	(c)	\$ <u>20,257.25</u>

Creditor asserts that the debtor(s) are contractually obligated for 12 / 01 / 2022
the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

***s/**Brian C. Nicholas (Atty ID: 317240)

Date 08/09/2023

Brian Nicholas
09 Aug 2023, 15:27:00, EDT

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

ESCROW RECONCILIATION

POST-PETITION PAYMENTS DUE PER NoPC's				ACTUAL FUNDS RECEIVED		ACTUAL FUNDS APPLIED			BALANCES	
Payment Due	Amt Due	P&I	Escr	Payment Rcvd	Amt Rcvd	Payment Applied	P&I	Escrow	Escrow Difference	Post Susp
										0.00
									0.00	0.00
									0.00	0.00
									0.00	0.00
									0.00	0.00
5/1/2017	\$2,256.10	\$1,428.96	\$827.14	5/25/2017	\$2,256.10	\$2,297.56		\$868.60	(41.46)	2,256.10
6/1/2017	\$2,256.10	\$1,428.96	\$827.14	8/4/2017	\$2,256.10	\$2,297.56		\$868.60	(41.46)	2,256.10
			*	9/15/17, to fees in PPFN	(\$650.00)				0.00	1,606.10
			**	9/15/17, to pre Escrow	(\$671.68)				0.00	934.42
			**	9/15/17, to pre l/c	(\$809.50)				0.00	124.92
			**	9/15/17, to pre prop insp fees	(\$42.00)				0.00	82.92
7/1/2017	\$2,256.10	\$1,428.96	\$827.14	12/1/2017	\$2,256.10	\$2,256.10	\$1,428.96	\$827.14	0.00	82.92
8/1/2017	\$2,256.10	\$1,428.96	\$827.14	1/5/2018	\$2,256.10	\$2,256.10	\$1,428.96	\$827.14	0.00	82.92
EO entered 6/11/18 for 10/1/17 - 6/11/18 (9 pyts) despite loan being due for 9/1/17, included 1031.00 atty f/c				6/29/18 for AO	\$21,335.90				0.00	21,418.82
				7/02/18 to MFR f/c	(\$1,031.00)				0.00	20,387.82
9/1/2017	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	18,131.72
10/1/2017	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	15,875.62
11/1/2017	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	13,619.52
12/1/2017	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	11,363.42
1/1/2018	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	9,107.32
2/1/2018	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	6,851.22
3/1/2018	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	4,595.12
4/1/2018	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	2,339.02
5/1/2018	\$2,256.10	\$1,428.96	\$827.14	7/2/2018 posted for AO		\$2,256.10	\$1,428.96	\$827.14	0.00	82.92
6/1/2018	\$2,256.10	\$1,428.96	\$827.14	8/14/2018	\$2,311.20	\$2,256.10	\$1,428.96	\$827.14	0.00	138.02
7/1/2018	\$2,311.20	\$1,428.96	\$882.24	9/18/2018	\$2,311.20	\$2,256.10	\$1,428.96	\$827.14	55.10	138.02
8/1/2018	\$2,311.20	\$1,428.96	\$882.24	10/3/2018	\$2,311.20	\$2,256.10	\$1,428.96	\$827.14	55.10	138.02
				11/15/2018	\$2,311.20				0.00	2,449.22
9/1/2018	\$2,311.20	\$1,428.96	\$882.24	12/5/2018	\$4,633.27	\$2,256.10	\$1,428.96	\$827.14	55.10	4,771.29
10/1/2018	\$2,311.20	\$1,428.96	\$882.24			\$2,311.20	\$1,428.96	\$882.24	0.00	2,460.09
11/1/2018	\$2,311.20	\$1,428.96	\$882.24			\$2,311.20	\$1,428.96	\$882.24	0.00	148.89
12/1/2018	\$2,322.07	\$1,428.96	\$893.11	3/1/2019	\$3,000.00	\$2,311.20	\$1,428.96	\$882.24	10.87	826.82
1/1/2019	\$2,322.07	\$1,428.96	\$893.11	5/14/2019	\$2,400.00	\$2,311.20	\$1,428.96	\$882.24	10.87	904.75
				7/16/2019	\$1,000.00				0.00	1,904.75
				8/28/2019	\$1,200.00				0.00	3,104.75

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Filed 08/09/23

Entered 08/09/23 17:19:04

Desc

2/1/2019	\$2,322.07	\$1,428.96	\$893.11	9/10/2019		\$2,311.20	\$1,428.96	\$882.24	10.87	782.68
				9/20/2019	\$800.00				0.00	1,582.68
				11/1/2019	\$600.00				0.00	2,182.68
3/1/2019	\$2,322.07	\$1,428.96	\$893.11	1/23/2020		\$2,297.67	\$1,428.96	\$868.71	24.40	-139.39
				1/28/2020	\$335.71				0.00	196.32
									0.00	196.32
									0.00	196.32
4/1/2019	\$2,322.07	\$1,428.96	\$893.11	2/6/2020	\$21,082.63	\$2,322.07	\$1,428.96	\$893.11	0.00	18,956.88
5/1/2019	\$2,322.07	\$1,428.96	\$893.11			\$2,322.07	\$1,428.96	\$893.11	0.00	16,634.81
6/1/2019	\$2,322.07	\$1,428.96	\$893.11			\$2,322.07	\$1,428.96	\$893.11	0.00	14,312.74
7/1/2019	\$2,322.07	\$1,428.96	\$893.11			\$2,322.07	\$1,428.96	\$893.11	0.00	11,990.67
8/1/2019	\$2,322.07	\$1,428.96	\$893.11			\$2,322.07	\$1,428.96	\$893.11	0.00	9,668.60
9/1/2019	\$2,322.07	\$1,428.96	\$893.11			\$2,322.07	\$1,428.96	\$893.11	0.00	7,346.53
10/1/2019	\$2,322.07	\$1,428.96	\$893.11			\$2,322.07	\$1,428.96	\$893.11	0.00	5,024.46
11/1/2019	\$2,322.07	\$1,428.96	\$893.11	2/19/2020	\$2,269.93	\$2,322.07	\$1,428.96	\$893.11	0.00	4,972.32
12/1/2019	\$2,269.93	\$1,428.96	\$840.97	2/24/2020		\$2,322.07	\$1,428.96	\$893.11	(52.14)	2,702.39
1/1/2020	\$2,269.93	\$1,428.96	\$840.97	2/25/2020		\$2,322.07	\$1,428.96	\$893.11	(52.14)	432.46
2/1/2020	\$2,269.93	\$1,428.96	\$840.97	3/11/2020	\$2,269.93	\$2,322.07	\$1,428.96	\$893.11	(52.14)	432.46
3/1/2020	\$2,269.93	\$1,428.96	\$840.97	4/6/2020	\$2,269.93	\$2,269.93	\$1,428.96	\$840.97	0.00	432.46
4/1/2020	\$2,269.93	\$1,428.96	\$840.97	5/5/2020	\$2,269.93	\$2,269.93	\$1,428.96	\$840.97	0.00	432.46
5/1/2020	\$2,269.93	\$1,428.96	\$840.97	6/10/2020	\$2,269.93	\$2,269.93	\$1,428.96	\$840.97	0.00	432.46
6/1/2020	\$2,269.93	\$1,428.96	\$840.97	7/10/2020	\$2,269.93	\$2,269.93	\$1,428.96	\$840.97	0.00	432.46
7/1/2020	\$2,269.93	\$1,428.96	\$840.97	8/11/2020	\$2,242.84	\$2,242.84	\$1,428.96	\$813.88	27.09	405.37
8/1/2020	\$2,242.84	\$1,428.96	\$813.88	9/10/2020	\$2,242.84	\$2,242.84	\$1,428.96	\$813.88	0.00	405.37
9/1/2020	\$2,242.84	\$1,428.96	\$813.88	10/13/2020	\$2,242.84	\$2,242.84	\$1,428.96	\$813.88	0.00	405.37
10/1/2020	\$2,242.84	\$1,428.96	\$813.88	11/24/2020	\$2,242.84	\$2,242.84	\$1,428.96	\$813.88	0.00	405.37
11/1/2020	\$2,242.84	\$1,428.96	\$813.88	12/23/2020	\$2,238.43	\$2,238.43	\$1,428.96	\$809.47	4.41	400.96
12/1/2020	\$2,238.43	\$1,428.96	\$809.47	1/26/2021	\$2,238.43	\$2,242.84	\$1,428.96	\$813.88	(4.41)	400.96
1/1/2021	\$2,238.43	\$1,428.96	\$809.47	2/25/2021	\$2,238.43	\$2,238.43	\$1,428.96	\$809.47	0.00	400.96
2/1/2021	\$2,238.43	\$1,428.96	\$809.47	3/17/2021	\$2,238.43	\$2,242.84	\$1,428.96	\$813.88	(4.41)	400.96
3/1/2021	\$2,238.43	\$1,428.96	\$809.47	5/4/2021	\$2,238.43	\$2,238.43	\$1,428.96	\$809.47	0.00	400.96
4/1/2021	\$2,238.43	\$1,428.96	\$809.47	6/15/2021	\$4,476.86	\$2,238.43	\$1,428.96	\$809.47	0.00	2,639.39
5/1/2021	\$2,238.43	\$1,428.96	\$809.47			\$2,238.43	\$1,428.96	\$809.47	0.00	400.96
6/1/2021	\$2,238.43	\$1,428.96	\$809.47	7/12/2021	\$2,238.43	\$2,238.43	\$1,428.96	\$809.47	0.00	400.96
7/1/2021	\$2,238.43	\$1,428.96	\$809.47	9/21/2021	\$2,238.43	\$2,238.43	\$1,428.96	\$809.47	0.00	400.96
8/1/2021	\$2,238.43	\$1,428.96	\$809.47	10/25/2021	\$4,476.86	\$2,238.43	\$1,428.96	\$809.47	0.00	2,639.39
9/1/2021	\$2,238.43	\$1,428.96	\$809.47			\$2,238.43	\$1,428.96	\$809.47	0.00	400.96
10/1/2021	\$2,238.43	\$1,428.96	\$809.47	12/30/2021	\$4,526.59	\$2,238.43	\$1,428.96	\$809.47	0.00	2,689.12
11/1/2021	\$2,238.43	\$1,428.96	\$809.47			\$2,238.43	\$1,428.96	\$809.47	0.00	450.69
12/1/2021	\$2,288.16	\$1,428.96	\$859.20	4/4/2022	\$2,288.16	\$2,238.43	\$1,428.96	\$809.47	49.73	450.69
									0.00	

Total Amount to Apply to Escrow: \$137.49 plus 102.48 on pre tab is 239.97
 Total Amount to Apply to Post * \$1,107.05
 Total: \$1,244.54

POST PETITION DUE DATE BALANCING			
	Contractual Due Date	1/1/1980	
	Remaining payments in plan	0	
	Remaining agreed order payments	0	
	Post Petition Payment	1/1/1980	

866 CIT	
FUNDS FROM H BUCKET	\$0.00
FUNDS FROM U BUCKET	\$0.00
FUNDS FROM 9 BUCKET	\$0.00
FUNDS FROM X BUCKET	\$0.00
FUNDS FROM ESCROW	\$0.00
FUNDS TO ESCROW	\$0.00
FUNDS TO PRE*	\$0.00
FUNDS TO POST*	\$0.00
FUNDS TO POST PAYMENT	\$0.00
FUNDS TO POST PAYMENT	\$0.00
SHOULD TOTAL ZERO*	\$0.00

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Cynthia Ann Schmidt
Woodrow Paul Schmidt, Jr.
Debtor(s)**

BK NO. 17-01806 HWV

Chapter 13

**MidFirst Bank
Movant**

Related to Claim No. 5-2

vs.

**Cynthia Ann Schmidt
Woodrow Paul Schmidt, Jr.
Debtor(s)**

**Jack N. Zaharopoulos,
Trustee**

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Brian C. Nicholas of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on August 9, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)
Cynthia Ann Schmidt
691 Silver Maple Circle
Seven Valleys, PA 17360

Attorney for Debtor(s) (via ECF)
Dawn Marie Cutaia
Fresh Start Law, PLLC
1701 West Market Street
York, PA 17404

Woodrow Paul Schmidt JR
691 Silver Maple Circle
Seven Valleys, PA 17360

Trustee (via ECF)
Jack N. Zaharopoulos
Standing Chapter 13 (Trustee)
8125 Adams Drive
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail.

Dated: August 9, 2023

/s/ Brian C. Nicholas
Brian C. Nicholas Esquire
Attorney I.D. 317240
KML Law Group, P.C.
BNY Mellon Independence Center
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